

1 Anthony R. Scisciani III, OSB No. 070013
Meredith A. Sawyer, *pro hac vice*
2 Lisa Lear, OSB No. 852672
Kelsey L. Shewbert, OSB No. 221063
3 HWS LAW GROUP
101 SW Main Street, Suite 1605
4 Portland, OR 97204
Phone: (503) 542-1200
5 Fax: (503) 542-5248
ascisciani@hwslawgroup.com
6 msawyer@hwslawgroup.com
llear@hwslawgroup.com
7 kshewbert@hwslawgroup.com
Attorneys for Defendant Vidocq Society

8
9
10
11 UNITED STATES DISTRICT COURT
12 DISTRICT OF OREGON
13 EUGENE DIVISION

14 NICHOLAS JAMES MCGUFFIN, as an
individual and as guardian *ad litem*, on behalf
15 of S.M., a minor,

16 Plaintiffs,

17 V.

18 MARK DANNELS, PAT DOWNING,
SUSAN HORMANN, MARY KRINGS,
19 KRIS KARCHER, SHELLY MCINNES,
RAYMOND MCNEELY, KIP OSWALD,
20 MICHAEL REAVES, JOHN RIDDLE,
SEAN SANBORN, ERIC
21 SCHWENNINGER, RICHARD WALTER,
CHRIS WEBLEY, ANTHONY WETMORE,
22 KATHY WILCOX, CRAIG ZANNI, DAVID
ZAVALA, JOEL D. SHAPIRO AS
23 ADMINISTRATOR OF THE ESTATE OF
DAVID E. HALL, VIDOCQ SOCIETY,
24 CITY OF COQUILLE, CITY OF COOS
BAY, and COOS COUNTY,

25 Defendants.
26

Civil Case No. 6:20-CV-01163-MTK
(Lead Case)

DECLARATION OF MEREDITH A.
SAWYER IN SUPPORT OF
DEFENDANT VIDOCQ SOCIETY'S
OPPOSITION TO PLAINTIFFS'
MOTION FOR LEAVE TO FILE A
COMBINED RESPONSE TO
DEFENDANTS' MOTIONS FOR
SUMMARY JUDGMENT

VIDOCQ SOCIETY,

Cross-Claimant.

v.

MARK DANNELS, PAT DOWNING,
SUSAN HORMANN, MARY KRINGS,
KRIS KARCHER, SHELLY MCINNES,
RAYMOND MCNEELY, KIP OSWALD,
MICHAEL REAVES, JOHN RIDDLE,
SEAN SANBORN, ERIC
SCHWENNINGER, RICHARD WALTER,
CHRIS WEBLEY, ANTHONY WETMORE,
KATHY WILCOX, CRAIG ZANNI, DAVID
ZAVALA, JOEL D. SHAPIRO AS
ADMINISTRATOR OF THE ESTATE OF
DAVID E. HALL, CITY OF COQUILLE,
CITY OF COOS BAY, and COOS COUNTY.

Cross Defendants

NICHOLAS JAMES MCGUFFIN, as an
individual and as guardian *ad litem*, on behalf
of S.M., a minor,

Plaintiffs,

v.

OREGON STATE POLICE,

Defendant.

Civil Case No. 3:21-cv-01719-MTK
(Trailing Case)

I, Meredith A. Sawyer, am over the age of eighteen years of age, am competent to testify
and have personal knowledge of the facts contained herein.

1. I am counsel of record for Defendant Vidocq Society.
2. Plaintiffs' counsel sent an email to all defense counsel on January 28, 2025, stating
their intention to file a motion seeking leave to file a combined response to the
defendants' individual motions for summary judgment and asked defense counsel to
advise if there was any objection. On January 30, 2025, I responded by email,
expressing my objection to a combined response brief. Counsel for Walter and the

1 Municipal defendants also communicated to plaintiffs' counsel their opposition to a
2 combined response brief.

- 3 3. At no point did Plaintiffs' counsel contact me or my office by telephone to confer
4 regarding their planned motion nor did I have any missed calls from Plaintiffs' counsel.

5 **I declare under penalty of perjury under the laws of the United States that the**
6 **foregoing is true and correct to the best of my knowledge, information, and belief.**

7
8 EXECUTED this 4th day of February, 2025 in Seattle, Washington.

9
10 /s/ Meredith A. Sawyer
11 Meredith A. Sawyer, *pro hac vice*
msawyer@hwsllawgroup.com
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26